

R05-14-A-026

January 20, 2014

Environmental Management Support, Inc.

Attn: Mr. Don West

8601 Georgia Avenue Suite 500

Silver Springs, MD 20910

Phone: (310) 589-5318

RE: City of Rushville, Town of Carthage, and Rush County Coalition EPA Brownfields Community-Wide Assessment Grant Proposal

Dear Mr. West,

The City of Rushville is pleased to submit this application as the lead applicant on behalf of the Coalition of the Town of Carthage, Rush County and Rushville. Our primary goal is to provide a high quality of life to our residents. Obtaining this grant to assess potentially contaminated sites will bring us one step closer to that goal. Once those sites have been assessed, we will be in a better position to apply for funds to provide clean- up and redevelopment. Subsequently, that clean-up and redevelopment will create much needed jobs.

We are a progressive community of hard-working individuals who embrace diversity and have a focus on the future. You will find our community has a rich heritage and a strong sense of community pride. Rush County, its City and Towns, has been described many ways: safe and comfortable, welcoming, friendly, encouraging and positive, "Sweet spot of the Midwest". But the most current description of "visionary and progressive" defines us best. We are determined to revitalize our community; this grant will provide resources to help do that.

We urge your utmost consideration to our application and look forward to a favorable decision. We are ready to move forward with implementation of these proposed activities! Thank you.

Sincerely,

Mayor Mike Pavey, City of Rushville

- a. Applicant Identification: The City of Rushville
- b. Applicant DUNS number: 048105332
- c. Funding Requested:
 - i) Assessment
 - ii) Federal Funds Requested: \$460,000
 - iii) Contamination: Hazardous and Petroleum
 - a. \$312,410 Hazardous
 - b. \$147,590 Petroleum
- d. Location: The City of Rushville, the Town of Carthage, and Rush County
- e. This is a community-wide application so this criterion does not apply
- f. Contacts:
 - i) Project Manager: John S. McCane, Executive Director, Rush County Economic & Community Development Corporation; River point Office Suites, 210 East US 52, Suite C, Rushville, Indiana 46173; johnmccane@rushecdc.org; 765-938-3232; 765-932-1825 (fax)
 - ii) Chief Executive: Mayor Mike Pavey, City of Rushville, 133 W. First Street, Rushville, IN 46173; mayor@cityofrushville.in.gov; 765-932-3735; 765-932-4355 (Fax)
 - iii) Chief Financial Officer: Ann Copley, Rushville Clerk-Treasurer, 133 W. First Street, Rushville, IN 46173; clerk@cityofrushville.in.gov; 765-932-2672; 765-932-4355 (Fax)
- g. Date Submitted: January 20, 2014
- h. Project Period: Spring 2014 through Spring 2017
- i. Population:
 - i) The general population of Rushville's jurisdiction is 6,431. Our coalition partner's populations are as follows:

Rush County: 17,392

Carthage: 927

ii) The population of the targeted areas are as follows:

Carthage: 927 Rushville: 6,341 Milroy: 404

V.B.1.a. Community Need: Targeted Community and Brownfields

i. Targeted Community Description: The City of Rushville is located in eastern Indiana, between the metropolitan centers of Indianapolis, Indiana and Cincinnati, Ohio. Rushville is the Rush County seat and population center of the County. It is located at the intersection of three state highways and bordered by the Flat Rock River to the south. The City of Rushville is the lead applicant for the EPA Brownfields Coalition Assessment Grant, representing the Coalition of Rushville, Rush County, and the Town of Carthage. Our targeted communities are the City of Rushville, the Town of Carthage and Milroy. We are targeting our citizens in poverty, especially children, as the populations to benefit from the brownfields initiative because they are disproportionately and negatively affected by the burden of brownfields. Currently, Rushville is home to many of the County's advanced manufacturing employers including Emerson Copeland (OEM and compressor manufacturer), Trane (heating and cooling), and INTAT Precision Casting. Carthage, 20 minutes north of Rushville, is a small town settled on the Big Blue River among fields of corn and soy. The Former Smurfit Stone, one of the example brownfields in this application, used to be a major employer for Carthage but now blights the neighborhood. Milroy, located minutes south of Rushville, is an unincorporated town of 404 people in southern Rush County, and is bounded by Lick Creek and home to Harcourt Outlines, Inc. manufacturing center. While many of the large manufacturers remained open throughout the 2008-2011 economic downturn, many have and downsized, laying off almost 7% of Rush County's entire labor force. Smurfit-Stone, a large manufacturer in Carthage, was forced to cease operations entirely in 2007 and declare bankruptcy in 2009.

Rushville and its coalition partners sit among a landscape of farms and small towns that rose around industrial centers. Access to major groundwater aquifers and surface water sources makes for some of the most fertile farmland in Indiana but also fueled industrialization of the area over the past two centuries, making it home to one of the highest concentrations of manufacturing jobs in the state. Rushville and Rush County's industrial history is rooted in manufacturing and have been major suppliers to the auto industry for more than half a century. Other manufacturing products produced in our targeted communities include: plastics, metal, electronics, and farm industry products like crop chemicals and machinery. Foreign competition in the late 20th century tightened the belt on the manufacturing industry throughout the County, and things got even tighter during the most recent recession. In a county with such limited population numbers (fewer than 18,000 people), this type of economic instability can have long-lasting effects. Rushville and communities throughout Rush County prize their small-town charm. Today, that charm is threatened by an increasing number of vacant, underutilized, and blighted commercial and industrial sites left behind by the economic downturns over the past 75 years. The overwhelming number of brownfield sites breeds blight and discourages new investment in a vicious cycle. Rushville is leading the effort to see this cycle change. In July 2013, 50 Rush County residents toured Rushville and gave input to civic leaders on how they would like to see 13 vacant/underutilized downtown Rushville properties reused. Their input will influence Rushville's in-progress Comprehensive Plan. This grassroots effort demonstrates a strong public commitment to making Rush County a better place.

ii. Demographic Information: The table below provides demographic information on our targeted communities as compared to the State and Nation.

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COMMUNITY DEMOGRAPHICS	Carthage	Rushville	Milroy	Rush Co.	Indiana	United States			
Population ¹	927	6,341	404	17,392	6,483,802	308,745,538			
Minority Population ¹	0.3%	2.7%	2.0%	3.3%	15.10%	26.7%			
Individuals Below Poverty Level 1	20.10%	19.60%	23.30%	12.80%	13.50%	13.80%			
Individuals aged <18 Below Poverty 1	32.6%	24.7%	30.1%	17.4%	18.90%	19.20%			
Percent of Renter Occupied Homes 1	33.9%	40.8%	24.4%	26.90%	30.10%	34.90%			
Percent Unemployed (Census) 2010 ¹	10.60%	12.90%	17.50%	9.40%	8.40%	7.90%			
Unemployment Rate 2012	Data not a	vailable for these	locations	7.9%2	8.4% ²	7.2%²			
Median Household Income ¹	\$37,212	\$36,599	\$43,125	\$46,685	\$47,697	\$ 49 , 445			
With Food Stamp Benefits ¹	12.60%	15.70%	10.7%	9.70%	9.50%	9.30%			
Worked Outside County Of Residence ¹	72.7%	40.5%	88.6%	52.80%	25.70%	23.60%			
¹ United States Census, 2010, American Commi	United States Census, 2010, American Community Survey ² Bureau of Labor Statistics								

iii. Brownfields: We have identified over 30 commercial and industrial brownfield sites in our targeted communities ranging in size from less than 0.5 acres up to approximately 180 acres. All are in need of Phase I and II Environmental Site Assessments. The table below outlines example brownfields in Rush County, as well as their potential contaminants and health effects.

NEIGHBORHOOD SPECIFIC BROWNFIELD SITES

Rushville Main St. 100-300 Blocks: Thirteen vacant or underutilized properties were identified along these blocks by Rushville residents as in need of revitalization. They are strong candidates for redevelopment due to their downtown location and community interest. Lead paint and asbestos are potentially present in all 13 properties, as well as heating oil tanks or old equipment that could contain polychlorinated biphenyls (PCBs). Inhalation of asbestos fibers is known to cause cancer and lead can affect a child's mental/physical growth. PCBs may be carcinogenic and can harm the immune, reproductive, nervous and endocrine systems.

Former Smurfit Stone, 180 acres: This massive former containerboard mill is on the banks of the Big Blue River in the backyard of a Carthage neighborhood. This former industrial site could potentially have contamination from solvents, metals, benzene, and polycyclic aromatic hydrocarbons (PAHs). Exposure can cause respiratory, immune, and circulatory system pathologies, as well as cancer. Exposure to these contaminants can also be dangerous to the immune system, reproductive organs, and unborn children.

Former Kerr McGee Site, 1.25 acres: This is a blighted structure adjacent to a Rushville residential neighborhood, making off-site migration of potential contaminants particularly concerning. Potential contaminants include: PAHs, lead, arsenic, and chromium. Exposure can cause respiratory problems, lung, skin, or bladder cancer, affects to immune, reproductive, and neurologic systems, kidney damage, damage to blood vessels and fetal toxicity and birth defects.

Vacant Lot, 0.2 acres: This vacant, debris-filled lot is an eyesore in a Rushville residential area. Multiple properties on the block surrounding the vacant lot have registered USTs, and at least one has had a reported release. Potential contamination is unknown, but could be anything from petroleum byproducts to cleaning solvents, which can cause damage to reproductive organs, unborn children, neurological disorders, and impact the immune system.

Triangle Property—Former Gas Station, 0.5 acres: a vacant building located at a gateway to Rushville is a concern to area developers. Potential contaminants include PAHs, lead, and benzene. Exposure could cause lung, skin or bladder cancer; effects to immune, reproductive, neurologic systems; severe skin, eve, nose, and throat irritation, kidney damage.

Former Grain Elevator, 2 acres: This blighted structure sits in a Rushville neighborhood and could contain benzene, lead, other petroleum contamination and asbestos. Exposure to contaminants such as benzene (known carcinogen) can impair bone marrow, blood, and immune system. Lead, another concern, can affect a child's mental/physical growth and cause premature birth. Asbestos fiber inhalation causes severe lung pathologies.

Former School, 3.6 acres: This blighted, deteriorating building could be dangerous to the Milroy neighborhood in which it sits. Based on the age of the school and visual inspection, lead paint and asbestos are potentially present. Inhalation of asbestos fibers is known to cause serious lung problems and cancer.

Information regarding contaminant effects was gathered from: http://www.atsdr.cdc.gov/substances/index.asp

iv. Cumulative Environmental Issues: A significant environmental issue is air quality. Air quality data is unavailable because no Metropolitan Statistical Area has been established here but the Indiana State Department of Health reports that Rush County ranked 7th highest in Indiana for counties with the highest asthma emergency rates in the State-ties into lung cancer in the 2011 publication, "The Burden of Asthma in Indiana," indicating that air quality may indeed be an issue. Rushville, Carthage, and Milroy have century-old combined sewers that transport stormwater, industrial wastewater, and sewage in the same pipe. With heavy rainfall or rapid snowmelt, combined sewers may bypass water treatment plants and overflow directly into waterways used for recreation and sustenance fishing.

The County soil, groundwater, and waterways face threats from Confined Feeding Operations (CFO) or Concentrated Animal Feeding Operations (CAFOs), which increases the concern regarding cumulative environmental impacts. The Center for Disease Control (CDC) reports these are a source of potential contaminants such as nitrogen and phosphorus, E. coli, growth hormones, antibiotics, animal blood, or leachate from corn feed. Rush County is one of only 14 Indiana counties with over 50

CFO/CAFOs, and has 872,742 animals in CFOs or CAFOs, according to IDEM and the US Department of Agriculture.

The collective presence of Brownfield properties, potential air impacts, CSOs, derelict manufacturing plants and CFOs/CAFOs amplify potential threats to human and environmental health. These threats include a broader suite of contaminants susceptible to migration routes to surface water bodies and groundwater dinking supplies. Unfortunately, local health agencies lack the funding to test soil and groundwater in the area, so the impacts to environmental media are unknown or under reported. Our communities' main waterways (the Flat Rock River, Mud Creek, and the Big Blue River) appear on the most recent Indiana Department of Environmental Management's List of Impaired Water Bodies. In poor rural communities, creeks and rivers are a source for recreation and can serve as food source for impoverished families, so impairment of waterways in Rushville and Rush County is a foremost concern. The impairments include: the presence of PCB-tainted fish, aluminum, mercury, and low oxygen conditions potentially influencing unnatural fish kill events. The main factor contributing to low oxygen levels is the build-up of organic wastes, such as from CFOs and CAFOs. Decay of organic wastes consumes oxygen and many chemical and biological reactions in ground water and surface water depend directly or indirectly on the oxygen amounts. Some pollutants produce direct demands on oxygen in the water, such as in the oxidation-reduction reactions of nitrate and ammonia, sulfate and sulfite, and ferrous and ferric ions. When dissolved oxygen levels get too low, it sets off a chain reaction that can result in everything from mass deaths of aquatic life to reduced drinking water quality.

We are targeting our citizens in poverty, especially children, as our populations to benefit from this brownfield initiative, because they are disproportionately affected by the presence or perception of environmental contamination present at brownfield sites and from cumulative impacts identified in this application. Our targeted communities (Rushville, Carthage, and Milroy) represent the targeted population of residents and children in poverty. Impoverished residents of the targeted communities do not have the financial means to move away from blighted areas and may lack the resources to seek medical care for health problems that can arise from potential exposure to contamination. These issues raise environmental justice and health concerns, especially in light of the depressed fertility rate and elevated cancer rates in Rush County.

V.B.1.b. Impacts to Targeted Community: The table to the right displays the health concerns in our

area. According to the Indiana State Department of Health (ISDH), Rush County has a higher incidence rate than Indiana for more than one-third of the fourteen top cancer sites listed by the Centers for Disease Control and Prevention. Rush County's mortality rate for cancer is almost 25% higher than Indiana's. Many of the potential contaminants commonly found at brownfield sites like the ones listed above have been linked to cancer.

Health Concerns Rates ¹						
	Rush Co.2	State ²	US ³			
Fertility Rate	57.7	65.1	64.12			
Cancer: Mortality	229.67	187.62	193.6			
Female Colon Cancer: Incidence	51.7	44.5	31.4			
Lung Cancer: Incidence	87.1	80	66.8			
Uterine Cancer: Incidence	18.9	14	0.9			
Female Kidney Cancer: Incidence	21.1	12.9	12.4			
Leukemia: Incidence	15.7	12.4	13.3			
¹ Rates are per 100,000 population ² Indiana State Department of Health, in.gov/isdh ³ Centers for Disease Control, wonder.cdc.gov						

Another health issue in our area is the low fertility rate. Fertility is a basic measure of health, and Rush County's fertility rate is only 89% of the State's rate. Contaminants such as metals, solvents, and petroleum byproducts—all commonly found on brownfield sites similar to the ones listed above—can impact reproductive organs and/or fetal health. Although the exact impact of brownfields on public health is unknown, the co-occurrence of the presence of brownfields and data showing high cancer rates and low fertility rates in the County is a grave concern. According to County Health Rankings and Roadmaps, a

ranking and research system developed by the Robert Wood Johnson Foundation, Rush County is ranked as one of the 20 least healthy counties (out of 92) in Indiana.

V.B.1.c.i. Financial Need: Economic Conditions

The County's certified budget in 2013 was 9% lower than the previous year's. The property tax caps imposed by the State in 2010 play a crucial role in this deficit. Property tax caps reduced property taxes levied in 2012 by almost 14% in Rush County, according to Ball State University's Center for Business and Economic Research. While property tax caps affected all counties in Indiana, Rush County was one of the

13 counties most gravely affected. Since 2008, the County budget has decreased by a massive 19%. Our individual communities are also suffering financially. The table to the right provides the certified budgets for the County and our targeted communities. Milroy is an unincorporated area, so its operations are included within the County budget. Carthage's 2013 budget is more than 51% lower than 2009's, due in part to its \$2.1 million wastewater management overhaul in 2012, completed

	Certified Budgets of Targeted Communities									
		Carthage	Rushville	Rush Co.						
	2013	\$197,397	\$4,979,889	\$8,865,793						
	2012	\$325,971	\$5,200,770	\$9,736,707						
	2011	\$295,400	\$5,786,789	\$8,672,039						
l	2010	\$305,677	\$5,878,983	\$9,747,717						
	2009	\$299,139	\$5,722,408	\$10,534,339						
	2008	\$286,253	\$5,654,723	\$10,959,971						

with funds from US Department of Agriculture's Office of Rural Development. Providing the match for the USDA funds deeply affected Carthage's finances. Out of Rush County's 12 townships, 7 saw a decline in net assessed value from 2012 to 2013. The City of Rushville (Jackson Township) also saw a decrease of more than 13% in their net assessed value of real estate in that time period. This type of economic downtown spreads to the residents, too. According to the U.S. Census Bureau, 20% of Rushville and Carthage residents live below the poverty level, about 1.5 times higher than the State and National average. In Rushville, unemployment rates were 1.5 times higher than the State unemployment rate at the most recent decennial census, and over 17% of the population in the Town of Milroy was unemployed.

ii. Economic Effects of Brownfield: We targeted the communities described in this application because they all have a strong correlation between the presence of multiple brownfields and high poverty and unemployment rates. The Smurfit-Stone Mill, one of our example brownfield sites, directly caused the loss of enough jobs to account for more than 13% of Milroy's total population when it closed in mid-2007. The town has had trouble recovering from the economic hit and loss of taxes on 180 acres of industrial land, as can be seen in the Certified Budget table above and in the Community Demographics table.

Homes recently sold near the example brownfields in our targeted communities are clearly suffering from the presence of these blighted sites in their neighborhood. In Milroy, the average price of recently sold homes around the Old School is 75% lower than the median price of recently sold homes throughout the community. The average price of recently sold homes in the neighborhood surrounding the Former Smurfit Stone in Carthage is about half the median list price for the entire town. Homes recently sold near the Grain Elevator and Former Kerr McGee Site in Rushville have an average list price of less than \$10,000, compared to the median list price of \$85,900 for the entire City. Most of these brownfield properties appear abandoned and derelict, and some are tax delinquent. Abandonment cuts into tax revenue and affects Rush County's ability to draw new business because the vacant buildings become eyesores. Further funding is essential to the success of Rush County and Rushville's redevelopment efforts because, as noted above, they don't have the excess revenue required to carry out such activities.

Our citizens also face financial difficulty, as demonstrated in the Community Demographics table above. Note that the poverty level for individuals in Carthage, Rushville, and Milroy is almost 1.5 times higher than the State and National level, and the median household income is 25-34% lower. Some of the poverty is certainly due to the high unemployment rates, which reaches as high as 17% of the citizens in Milroy. The lack of local jobs in Rush County is the issue we hope to impact the most through assessing and redeveloping brownfield sites. Providing our residents with opportunities to earn a paycheck and

increase their earning power through high-quality jobs is an absolute priority. When incomes are low or nonexistent, family finances can only be spent on necessities such as housing, utilities, and groceries, and the disposable income that keeps the local economies moving forward disappears. Additionally, many low-income or unemployed residents are forced to rely on government funding to survive. More than 15% of the population in Rushville uses the Supplemental Nutrition Assistance Program to feed their families, compared to fewer than 10% of all Indiana and US residents. The high unemployment rate itself further impacts local government resources, as citizens drawing unemployment benefits contribute fewer income taxes. The communities and citizens of Rush County are locked in a cycle of poverty and unemployment. A Ball State University study, "Personal Income in Indiana," ranked Rush County in the bottom 20 counties in the State. According to the study, Rush County's citizens have the same standard of living as the Nation did in 1997. It's clear that the overall health and standard of living in Rush County could be improved, and we hope to play a part in that through assessing, remediating, and redeveloping brownfields.

V.B.2.a.i. Project Description: The City of Rushville, in alliance with the town of Carthage and Rush County, requests \$460,000 EPA Brownfields coalition funding to assess and develop cleanup plans for potentially contaminated hazardous substance and petroleum sites in our targeted areas and other communities within the county. Tasks include implementing County-wide community outreach, developing a prioritized inventory throughout the County, conducting 17 Phase I Environmental Assessments and 10 Phase II Investigations and developing six clean up plans for prioritized sites within the three year term of the grant. The Brownfields Initiative initially began in 2010 under the Eastern Indiana Development District (EIDD) Brownfields Coalition of four counties including Rush. In 2012, the EIDD was awarded \$540,000 from the EPA for an EPA brownfields assessment grant but was unable to receive the grant due to dissolution of the organization caused by employee fraud and embezzlement. Since that time, the City of Rushville, the town of Carthage, and the County have formed a brownfields coalition to formalize a brownfields program countywide. Rushville's Comprehensive Plan, which is currently in progress, is incorporating the brownfields initiative as one of its prime strategies. This plan will outlines our goals to provide a high quality of life to our residents, bring jobs to Rush County (especially in the fields of alternative energy and manufacturing), and revitalize downtown Rushville will be a model to other Rush County communities facing these same issues. Redeveloping local brownfield properties will improve quality of life by removing blight and promoting community and economic development. Jobs will be brought to the community as vacant commercial and industrial sites are redeveloped into productive properties that contribute goods, services, and opportunities to the community. Rush County residents will

be prepared to fill these jobs, as Rush County is participating in the Work Ready Communities program and Rush residents are eligible for training scholarships through the Manufacturing Matters program. Both programs are designed to educate the workforce to enable citizens to get high quality jobs in the manufacturing and technology sectors. Manufacturing Matters provides scholarships to individuals to earn a Nationally recognized credential and six college credits. Our county seeks employers in the renewable energy industries such as the proposed wind farm in northern

Example Brownfields: Potential Redevelopment	Industrial/ Manufacturing	Commercial	Retail Opportunity	Housing Opportunity
Rushville Main St. 100-300 Blocks		X	X	X
Former Grain Elevator	X	X		
Triangle Property Former Gas Station		X	X	
Former Kerr McGee Site	X	X		
Former Smurfit Stone	X			
Vacant Lot		X	X	
Former School			X	X

Rush County, and Rushville supports plans to see more opportunities for alternative energy—and the high-quality jobs that come with them—reach the region.

Rushville has already received community input on downtown revitalization planning. In July 2013, residents went on a walking tour of Rushville's downtown, stopping at addresses from a list of properties that are vacant or under-utilized. At each stop, they provided ideas of what a property could become and what was needed for a better future in Rushville. Their input will help shape the downtown revitalization aspects of the Comprehensive Plan, and we have included the properties they identified in our list of example brownfield sites. We will use the funds requested in this application for Phase I and II ESAs of our high-priority vacant and potentially contaminated industrial/commercial properties so they can find reuses that will create jobs while eliminating blight. The current brownfields inventory contains over 30 commercial and industrial sites, and we expect it to grow during the grant period as we reach out to the communities for input. Below are the projected redevelopment opportunities for our targeted brownfields.

ii. Project Management Approach: Following the announcement of the award, the City will submit our Memorandum of Agreement (MOA) with the Town of Carthage and Rush County to the EPA documenting the site selection process for this project and draft a workplan for EPA approval. The project will be announced on our Facebook Page and we will work with our local, Federal, State, and community-based partners to provide notification to their constituents and members through meetings, newsletters, communication with the local press, and through a Facebook/Twitter social media campaign. Once the EPA approves the work plan, the Request for Qualifications will be issued and we will select a skilled environmental consultant in compliance with Federal procurement requirements (40 CFR 31.36). We will choose a consultant experienced with the EPA and Indiana Brownfields programs with the capacity to complete the project in 3 years, and has a proven track record with successful U.S. EPA grants, State grants or loans, tax credits, and other incentives. Our consultant will also be able to provide greener assessment and cleanup techniques such as minimizing number of samples and sample waste, reducing field mobilizations, and using fuel-efficient equipment.

The City will coordinate project management and day-to-day grant operations with our economic development arm, the Rush County Economic and Community Development Corporation (ECDC). Activities will include updating and maintaining the countywide brownfields inventory, distributing information about the project to the communities, selecting sites for assessment, and tracking project progress. We will be responsible for submittal of quarterly reports to the EPA, Assessment, Cleanup, Redevelopment Exchange System database entry, and managing the brownfields information within the County GIS database. The City Clerk Treasurer will manage and track all financial transactions and generate required financial reports. Our consultant will prepare the Quality Assurance Project Plan to be submitted to the EPA for approval and submit eligibility requests for identified sites to either the Indiana Brownfields Program for petroleum sites or EPA for hazardous materials. In consultation with our coalition partners, we will prioritize sites submitted by the community for assessment according to our ability to gain access, their potential for redevelopment and job creation, and their level of blight and threat to health and safety, and. The County has established protocol to gain site access from private property owners; however, should initial inspections or assessments reveal imminent threat to public health or safety, we will work with the Rush County Health Department and IDEM to coordinate a response to eliminate those threats. In concert with the ECDC, the City will submit quarterly reports that track the project's progress in meeting its goals and objectives and include an update of project expenditures. They will also track the activities and expenses incurred. As site-specific information is generated, it will be reported in the Assessment Cleanup and Redevelopment Exchange System (ACRES) database.

A minimum of five sites will be assessed, however, we anticipate **Up to 17 Phase I Environmental Site Assessments (ESA)** being conducted in compliance with All Appropriate Inquiry and ASTM standard E1527-13. If the Phase I reveals recognized environmental conditions, then these findings will

be presented to the Coalition and community stakeholders to determine the next steps. Due to the nature and age of the sites in our target area, we expect at least 70% of them to require assessment beyond a Phase I. For sites requiring a Phase II ESA, a Sampling and Analysis plan and a Health and Safety Plan will be submitted to EPA for review and approval. **Up to 10 Phase II ESAs** will be conducted in compliance with the Quality Assurance Project Plan, ASTM Standards and the IDEM Remediation Closure Guide (RCG). The primary goal of RCG is to ensure that risks to human health and the environment are evaluated. For sites that do not require further assessment, the County will request a No Further Action, Comfort Letter, or Site Status letter from the Indiana Brownfields Program on behalf of prospective developers. **Up to 6 Remedial Action Plans (RAPs)** will be developed for prioritized sites requiring remediation. The RAPs may include information needed to apply for the "Shovel Ready" program with the Indiana Economic Development Corporation Analysis of Brownfields Cleanup Alternatives (ABCAs) for inclusion into requests for EPA Cleanup Grants, Corrective Action Plans compliant with IDEM Underground Storage Tank requirements, demolition specifications for the rehabilitation or demolition of existing buildings, and/or quantification of cleanup costs for prospective developers.

Our economic development partner, ECDC, will be responsible for identifying and tracking all opportunities for leveraging individual projects to maximize redevelopment potential. The ECDC will also prepare and market these sites for redevelopment. For sites that create jobs upon redevelopment and there are identified skill sets required, we will work with WorkOne to assist our unemployed/ and underemployed residents with occupational skills training.

iii. Site Selection: Sites will be selected and prioritized based upon input from the community through community meetings, our partners in community-based organizations, and our social media campaign. Our partners in the Girl Scouts and Boy/Eagle Scouts will be assisting in creating the brownfields inventory as part of a merit-earning service project, and their input will be highly valued. Final decisions on sites selected for assessment will be based on our ability to gain access to the site, job creation/redevelopment potential, community interest in the site, level of blight within the community and potential for health-threatening contamination. The Rush County Economic and Community Development Corporation, as well as government officials within each community, will work with property owners to gain site access. If there is imminent threat to health and welfare, the County Health Department and/or the Indiana Department of Environmental Management has legal means to access these sites.

V.B.2.b.i. Task Description and Budget Table: Task 1: Programmatic Activities and Outreach: The \$34,000 budget (\$21,500 hazardous/\$12,500 petroleum) includes \$ 18,500 programmatic costs and community engagement, travel and supplies at \$6,500 and contractual at \$11,500. Personnel: \$16,000 (320 hours at \$50/hr): (\$11,000 hazardous; \$5,000 petroleum): the Coalition will:

- Oversee the Cooperative Agreement, quarterly reports, accounting/financial reporting system
- Participate in brownfields/economic development workshops, conferences
- Advertise RFQ, ensure procurement meets Federal requirements, review proposals, select qualified Environmental Consultant; oversee consultant contract terms/consultant activities
- Track outputs/outcomes; apply for local, State, and Federal leveraging funds; seek funding partners
- Provide coordination/support/record for 4 public meetings, 12 stakeholder meetings; draft media releases, FAQ sheets, presentations for outreach; update website; coordinate/maintain outreach and services that our partners have offered to this initiative

<u>Travel</u>: \$4,000: (\$2,000 hazardous; \$2,000 petroleum): Travel (airfare, lodging, per diem) to the EPA regional or State brownfields workshops/conferences (\$3,300); other training opportunities (\$700) <u>Contractual</u>: \$11, 500: (\$7,000 hazardous; \$4,500 petroleum): Costs include drafting technical summaries for quarterly and final reports, attendance/presentations at public, stakeholder and property owner meetings, development of presentation materials and handouts.

Task 2: Inventory and Prioritization: The \$7,000 budget (\$4,500 hazardous/\$2,500 petroleum) includes personnel costs (\$3,000) and contractual cost (\$4,000) as described below:

<u>Personnel: \$3,000 (60 hours at \$50/hr): (\$2,000 hazardous; \$1,000 petroleum):</u> tour communities, inspect sites and meet with stakeholders, collect eligibility data for sites; maintain inventory; update the coalition website, input data into EPA's ACRES and our GIS database.

Contractual: \$4,000: (\$2,500 hazardous; \$1,500 petroleum): Costs include collecting technical data for eligibility requests, input data into EPA's ACRES and setting up and maintenance of the Brownfield Inventory Tool (BIT) created by EPA Technical Assistance to Brownfields program.

Task 3: Phase I and II Environmental Site Assessments (ESAs): The \$389,000 budget (\$271,410 hazardous/\$117,590 petroleum) includes personnel costs (\$14,000) and contractual costs (\$375,000) to conduct 17 Phase I ESAs in compliance with All Appropriate Inquiry & E1527-13 Standard Practice for Environmental Site Assessments, or the ASTM E2247-08 Forestland and Rural Property, and 10 Phase II ESAs in compliance with ASTM and State guidance;

<u>Personnel: \$14,000 (280 hours at \$50/hr): (</u>\$9,410 hazardous; \$4,590 petroleum): costs include arranging site access, contractor oversight, report review, and discussion of findings with stakeholders.

Contractual: \$375,000: (\$262,000 hazardous; \$113,000 petroleum):

- \$5,500 Consultant will draft Quality Assurance Project Plan (\$3,000 haz./\$2,500 petro)
- \$49,300 Conduct up to 17 Phase I ESAs at average cost of \$2,900 each (12 hazardous ESAs for \$34,800 and 5 petroleum ESAs for \$14,500)
- \$320,000 Conduct 10 Phase II ESAs (7 hazardous at average cost of \$32,000 and 3 petroleum at average cost of \$31,000 each, totaling \$224,000 for hazardous & \$96,000 for petroleum)

Task 4: Cleanup Planning: The \$30,000 budget is all contractual with \$15,000 for hazardous/\$15,000 for petroleum to develop six remedial action plans (3 hazardous/3 petroleum). Cleanup Plans will include an evaluation of remediation approaches or systems that incorporate greener cleanup measures. Cleanup planning may also include insurance archeology to determine if insurance recovery is applicable for cleanup of the site; the Indiana Supreme Court recently reaffirmed that historic general liability insurance policies from decades ago to, in some cases, may afford coverage to investigate and clean up polluted sites.

ii. Budget Table: The Coalition requests \$460,000 (\$312,410 hazardous substance/\$147,590 petroleum) of EPA brownfields funds to conduct a comprehensive outreach program, conduct a regional county inventory with prioritized brownfields, develop a QAPP, conduct up to 17 Phase I ESAs, 10 Phase IIs, and 6 cleanup/reuse plans; a minimum of 5 sites will be addressed with these funds (92% of requested funds are committed to contractual activities).

EPA Brownfields Assessment Budget Request FY2014-2017							
Program Tasks:	Task 1: Programmatic& Outreach	Task 2: Inventory, Prioritization	Task 3: Phase I, Phase II	Task 4: Cleanup Planning	Budget		
		Hazardous Budget					
Personnel(non-administrative)	\$11,000	\$2,000	\$9,410	0	\$22,410		
Travel	\$2,000				\$2,000		
Supplies	\$1,500				\$1,5 00		
Contractual	\$7,000	\$2,500	\$262,000	\$15,000	\$286,500		
Total Hazardous	\$21,500	\$4,500	\$271,410	\$15,000	\$312,410		
		Petroleum Budget					
Personnel (non-administrative)	\$5,000	\$1,000	\$4,590		\$10,590		
Travel	\$2,000		_	_	\$2,000		
Supplies	\$1,000	-			\$1,000		
Contractual	\$4,500	\$1,500	\$113,000	\$15,000	\$134,000		
Total Petroleum	\$12,500	\$2,500	\$117,590	\$15,000	\$147,590		
Total EPA Budget Requested	\$34,000	\$7,000	\$389,000	\$30,000	\$460,000		

V.B.2.c. Ability to Leverage:

The EPA grant funds requested in this application will aid our efforts to identify abandoned, tax delinquent properties with potential for contamination and return them to the tax rolls. We have 14 community organizations that are willing to leverage their time and resources to aid in this project. While it is difficult to quantify activities like providing outreach and input, these efforts will catalyze the success of this project. Their letters of support are documented in Attachment D.

There are several Federal and State programs that support brownfield redevelopment and we will apply for funding as assessments are completed and end-use objectives are finalized. Our communities are strong candidates for funding, but the strength of these commitments and likelihood of materialization during the grant period is dependent upon the outcome of the assessments.

	Federal and State Leveraging Opportunities							
Program Name	Amount	Program Description	Application to brownfields program					
Indiana Finance Authority: Indiana Brownfields program (IBP)								
Revolving Loan Fund	\$500,000	Cleanup activities to address hazardous	Remediation of Brownfields Sites					
		substances/petroleum contamination						
State Revolving Fund:	Project cost	Integrating a nonpoint source project into	Eligible brownfields remediation					
Brownfields	folds into	wastewater projects funded under Section	remediated and interest rate for SRF is					
Nonpoint Source	Section 319	319 of Clean Water Act	reduced by 5%					
Projects	projects							
Tax Waiver –	Waiver back	Petition to Dept. of Local Government	Removes financial barrier of back taxes					
Brownfields	taxes	Finance for waiver of delinquent tax	to facilitate brownfields redevelopment					
		US Environmental Protection Agency						
Brownfields Cleanup	\$200,000/	Outreach and Cleanup activities to address	Community Involvement/Remediation					
Grants/Revolving	\$1 million	hazardous substances/petroleum	of Brownfields Sites					
Loan Funds		contamination						
US EPA Technical	Technical	Kansas State University provides technical	Community Outreach/ Training,					
Assistance to	Assistance/	assistance and support to Brownfields	Visioning for Site reuse, Greener					
Brownfields (TAB)	Visioning	Communities (at no cost)	Cleanup Strategies for cleanup plans					
	Indiana	Department of Natural Resources (per pr	oject site)					
Recreational Trails	Up to	Funds the acquisition and/or development	Potential brownfields					
Program	\$150,000	of multi-use recreational trail projects.	acquisition/redevelopment for urban					
		•	trails and City connectivity.					
Land & Water	Up to	Assists eligible governmental units in the	Reusing a former brownfield site as a					
Conservation Fund	\$200,000	provision of new park areas.	park is an excellent end use example.					
Historic Preservation	\$500,000	Helps to promote historic preservation and	Many brownfields are historic					
and Archaeology	(annual)	archaeology in Indiana	properties-this funds rehabilitation of					
			historic structures					
Indiana Offi	ice of Commu	nity and Rural Affairs (Community Develo	pment Block Grant funding)					
Main Street	\$800,000	Funds long-term community development	redevelop downtown areas/ develop					
Revitalization Grant		for low income and blighted areas	community or senior centers on former					
			brownfield sites					
Planning Grant	\$1 million	Funds infrastructure, downtown	Downtown revitalization is a major goal					
	(annual)	revitalization, and community facilities.	of our current brownfields initiative.					
Public Facilities Grant	\$2 million	Funds Emergency Services Projects,	Brownfields redevelopment as Public					
		Historic Preservation, and Public Facilities	facilities projects funded					
Comprehensive Site	\$750,000	OCRA partnership with Indiana	Cleanup/Demolition of brownfields					
Redevelopment		Brownfields Program-funds cleanup	sites					

V.B.3. Community Engagement and Partnerships

V.B.3.a. Plan for Involving Community: The following community-based groups have pledged their support: Rushville Optimist Club, Milroy Economic Development Group, Rushville Rotary Club, Carthage Volunteer Firefighters, Rush County Chamber of Commerce, Rush County Historical Society, Partners for

Progress, and the Rush County Girl Scouts of Central Indiana. This broad base will ensure the sharing of information effectively with all target groups as they work to involve the community in the brownfields initiative. For example, the Carthage Volunteer Fire Department works with all socioeconomic sectors of their community, the Rotary Club has a membership base characterized by an older population, the Chamber of Commerce and Milroy Economic Development Group work closely with potential developers and employers, and the Optimist Club serves our targeted population of impoverished citizens. We are pleased to have the support of these organizations, as they have had success with community engagement in the past, such as in the July 2013 Downtown Rushville Dream Walk, where over 50 Rushville residents aged 11 through 84 joined together to create a new vision for what Downtown Rushville could become. The effort was put together through the Chamber of Commerce and Partners for Progress. Residents walked the downtown district, stopping at addresses from a list of properties that are vacant or under-utilized in the community and provide ideas of what a property could become and what was needed for a better future in Rushville.

We will distribute fliers discussing the project and providing progress reports to these groups, and to other supporting organizations that serve our low-income population, such as WorkOne and the Rush County Health Department. We will have them invite their members and the population they serve to our public meetings, so all of our citizens will have the opportunity to provide input on site selection/prioritization for assessment, cleanup, and reuse planning. Each organization can reach out to their targeted community by handing out fliers at meetings, email or social media blasts to their members, or displaying information on their public bulletin board.

The City will also conduct a concerted outreach program using print and social media to request involvement in the brownfields initiative and report progress. We will establish a Facebook and Twitter account for the Brownfields Coalition, and will request resident input and regularly post updates on sites as they are assessed, when appropriate. We will also post facts about environmental health and community development news. We will target residents of Rush County and stakeholders in our area as followers of our social media campaign. To kick off our print media campaign, we issued a press release to *The Rushville Republican*. On January 17, 2014, they ran an article regarding the purpose of this application and requesting community input for site inventory. We will announce awarded funds and communicate project progress through the newspaper as well as through our social media presence, as the newspaper is the most widely-consumed source of communication in our population.

Following the initial announcement, we will open a public comment period and hold meetings in Rushville, Carthage, and Milroy at least biannually to discuss the next steps of the project. We will solicit public input when selecting sites and take their requests into consideration when prioritizing them for assessment. The Rush County Health Department will be a key partner in explaining any potential health concerns to residents. As clean-up and/or redevelopment planning is initiated for a site, more intensive involvement activities will be implemented, such as public meetings to discuss plans and request feedback. At the close of the Project, the City will hold a final public meeting to notify the community of the successes and challenges faced during the Project and request comments regarding the interest in pursuing additional grants. English is our primary language of communication, but translators, sign language interpreters, and translated documents will be made available upon request to assist any non-English speaking or hearing-impaired residents.

V.B.3.b. Partnerships with Government Agencies: The Rush County Health Department has pledged to assist us in disseminating information regarding environmental health concerns relating to brownfields. Their letter of support is included in Attachment D. We already have a strong partnership with this agency through their free senior health screenings, held once monthly. With respect to implementation of this Grant, the Indiana Brownfields Program and Indiana Department of Environmental Management are important partners, particularly in providing technical guidance, reviewing

remedial action plans to ensure compliance with Remediation Closure Guidelines, and bringing sites to closure. The IBP works closely with the IDEM, who is the cleanup authority for the State and will sign liability-limiting letters for our prospective purchasers. We will also utilize the technical expertise of **Technical Assistance to Brownfields** to aid us in preparing our Work Plan, Request for Qualifications, and in reuse visioning for the sites we assess.

The **EPA** will be a significant partner in brownfields funding as we build our capacity and seek to become a leader in rural brownfield programs. We also plan to seek funding from the following agencies, highlighted in bold. Because funding has not yet been sought, we could not obtain letters of support from these agencies, as it would compromise the competitive nature of their awards.

The Economic Development Administration, which provides funding and technical assistance to our distressed communities to revitalize, expand, and upgrade their physical infrastructure to attract new industry, encourage business expansion, diversify local economies, and generate or retain long-term, private sector jobs and investment. The Office of Community and Rural Affairs provides resources to shape rural communities' visions for community and economic development as they grapple with brownfields. They fund infrastructure construction, downtown revitalization, community facilities projects, and clearance and redevelopment funding. They also distribute Housing and Urban Development funding to stabilize communities that have suffered foreclosures and abandonment, and disaster recovery funds. The Indiana Finance Authority provides financing solutions to facilitate infrastructure, brownfields cleanup, and other local government and business investments. The United States Department of Agriculture provides loans to emerging rural small businesses and employee training programs and funds the construction of community facilities. The Indiana Department of Natural Resources assists in the conservation and provision of parks, recreational trails, and historic preservation. The Indiana Department of Transportation provides funds for safe, efficient means of transportation and enhancements such as lighting, sidewalks, pedestrian and bicycle infrastructure, making our communities livable and walkable.

V.B.3.c. Partnerships with Community Agencies: Partners for Progress is a nonprofit group dedicated to addressing areas of concern in Rush County communities. They pledge to help identify the needs of the neighborhoods in which there are brownfields sites and aid in visioning activities, as they did with the Dream Walk, which solicited resident input about downtown Rushville revitalization. They will also communicate project benefits to residents and property owners and encourage developers to locate to brownfield sites. The Milroy Economic Development Group and Rush County Chamber of Commerce work with business owners and advocates on behalf of the business community. They have committed to identifying entrepreneurs interested in purchasing and using brownfield sites, educating potential developers and marketing former brownfield sites to them, and perform community outreach through their website. The Rush County Historical Society curates and preserves the history of Rush County and promotes historic preservation. They will support the Coalition's efforts by offering expertise, developing a list of historical buildings that could be included on the brownfields inventory, and providing a platform for discussing brownfield properties at their meetings. The Rushville Optimist Club is a community group made up of a broad membership base that is dedicated to improve the future prospects of the community. They will educate Rush County youth about the brownfields initiative and seek their input, and will provide that input to the brownfields project team. The Rushville Rotary Club works to envision ways to meet the needs of Rushville and Rush County, and they commit to working with the brownfield team to identify brownfields and assist with redevelopment ideas and business plans for reuse. The Rush County chapter of the Girl Scouts of Central Indiana has pledged to develop an inventory of brownfields in Rushville and other Rush County communities, create a Brownfields Map of the County, and present the inventory and map to the Mayor of Rushville.

V.B.4.a. Project Benefits: Health and/or Welfare and Environment: Assessing these properties will allow us to determine which contaminants are present and in what concentration. Once the exact impacts are known, we will be better suited to perform appropriate remediation activities to remove contaminants that are causing or exacerbating the health problems in our community. The eventual remediation of brownfields sites will result in improvements to public health and the environment, especially because some of our sites are near waterways, in residential areas, or have deteriorated to the point that they are unsafe. For example, suspect ACMs are exposed to the elements and the general public. As remediation is completed, and the source contaminants are removed, air quality may improve, leading to improved health statistics over time. Since those living in poverty tend to be more susceptible to the problems stemming from contamination, and is the population living in proximity to brownfield sites, we are especially interested in improving the health of our targeted population: our lowest-income residents and children.

Although there will be many positive outcomes that stem from assessment and cleanup alone, the planned reuse of our brownfield sites ensures that our communities will preserve and protect the environment in which they exist. Instead of expanding our carbon footprint with new growth, we will use existing infrastructure through infill development. We plan to foster mixed-use development in our downtown and neighborhood sites to promote a vibrant community. Properties located in our targeted communities offer the most desirable locations in the County because of their proximity to town centers and transportation corridors. Creating commercial and industrial locations in central portions of our communities will also encourage alternative modes of transportation, such as walking or biking, which will reduce pollution from automobile transportation.

Redeveloping brownfields will create benefits that help solve the targeted problems of the impoverished citizens and children in our communities. We chose the specific sites mentioned in this grant application because of their potential for contamination that could affect public health and their latent potential for job creation and community revitalization

Example Brownfields Redevelopment Benefits

1	Eli	ata Dat	i-1 C	ontamir	C			
	Cumin	ate Pot	ential C	ontamir	iant soi	ırce		
		Remov	ve Bligh	t				
			Impro	ve Walk	ability			
				Gatew	ay Revi	talizatio	n	
					Job C	reation		
						Down	town Re	vitalization
							Provid	e Affordable Housing
Rushville Main St. 100-300 Blocks	X	X	X			X	X	
Former Grain Elevator	X	X	X		X	X		
Triangle Property Former Gas Station	X	X		X				
Former Industrial Site	X	X	X		X	X		
Former Smurfit Stone	X	X	X		X			
Vacant Lot		X	X			X		
Former School	X	X	X	X	X		X	

once redeveloped. Each site was evaluated for its potential benefits across seven different categories.

In all instances of brownfield redevelopment, sustainability will be a primary focus. Buildings will be reused if possible, and deconstruction or demolition will only occur if a building is deemed unsafe, allowing us to preserve and reuse materials instead of creating waste. Environmental assessments will be performed by a contractor who follows best practices for greener assessments, including using emissions-compliant equipment, sampling methods that limit waste, and avoiding disturbance of the natural environment whenever possible. Green remediation will also be chosen whenever feasible for cleanup, and our Analyses of Brownfields Cleanup Alternatives will factor in the following greener cleanup core criteria: Energy Use, Air Emissions, Water Use, Land and Ecosystem Waste Generation/Recycling/Reuse, Land and Ecosystem Use and Effects. As part of the phases of assessment, cleanup, and redevelopment, we can examine the efficacy of our current storm water management systems and attempt to use rain gardens and natural plantings as alternative methods to managing storm water when considering redevelopment of existing structures. In addition, our utility companies can offer rebates and incentives to new developers

who plan to incorporate green energy and make use of energy-efficient options when considering their consumption of resources. During rebuilding and redevelopment, we can encourage seeking LEED certification by making developers aware of the benefits and incentives offered for LEED buildings. We will also seek out grants that promote sustainable development such as the Community Conservation Challenge and EPA's Building Blocks for Sustainable Communities. This will further promote the ideology of sustainability and respect for the environment that our Coalition wants to promote as we move into the future and mitigate the brownfields in Rush County to create a better quality of life for our residents.

Two social issues we will continue to address through brownfield remediation and redevelopment are unemployment and poverty. With almost 13% of our population center's residents being unemployed, and nearly 20% of its citizens living in poverty, we are in a state of crisis. Until we reduce the unemployment and poverty rates for our citizens, their quality of life will continue to suffer.

V.B.4.b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

i. Throughout Rushville and Rush County, planning and policies are fostering sustainable development through renewable energy, alternative transportation planning, and building materials reuse. In 2009, Rush County's zoning ordinances were amended to include guidelines for land used for wind turbines to harness renewable wind energy. In 2010, Rush County began working with alternative energy provider Nordex and neighboring Henry County to plan a 75-turbine wind farm over 25,000 acres. About 50 of those turbines will be placed in Rush County, and each 2.5-megawatt turbine will require a construction permit costing about \$20,000. Each turbine would produce about \$10,000 in property tax revenue each year, and property owners with a turbine would receive between \$19,000 and \$24,000 a year. Construction on this project is planned for 2014. Rush County is an ideal place to manufacture wind energy because of its location and topography, and the County is pleased to offer zoning ordinances that will allow for construction of renewable energy sources, including commercial, non-commercial, and micro Wind Energy Conversion Systems within our borders.

The City of Rushville is also including alternative modes of transportation and building materials reuse/recycling as it expands its infrastructure. The North Rushville Industrial Park construction began in 2013 based on its location among existing infrastructure, and it will be connected to Rushville's older industrial park via a street widening that includes a bike lane and sidewalk that will allow pedestrians and non-motorized vehicles to travel between these two community hubs. The City is also including bike trails and pedestrian paths in its Comprehensive Plan and will utilize Rails-to-Trails programs to convert formerly used railways into pedestrian-friendly trails. Rushville applied for a \$150,000 Department of Natural Resources grant for a recreational trail that would be accessible by disabled individuals. Additionally, since 2008, Rush County has been operating Ride Rush, a fleet of public-transportation vehicles (with wheelchair accommodation) to offer affordable alternative transportation to Rush County residents. One example of building materials reuse in Rushville comes from its historic Miller's Drive-In Restaurant, which is currently being redeveloped. Instead of demolishing the unique 1950's era V-shaped canopy, as well as the structural fames, beams, and menu boards, the City is preserving them through deconstruction and saving them for a future use.

ii. Example of Efforts in Planning/Integrate Equitable Development: Our brownfields initiative is compatible with the Livability Principles adopted by the partnership between the EPA, Department of Transportation, and Housing and Urban Development. We will provide more transportation choices by increasing downtown walkability through infrastructure improvements and creating jobs within walking distance of residential areas. Each of our 7 example brownfields provided in this application will allow for this. We will promote equitable, affordable housing by reusing brownfield sites such as the Main St. Rushville sites and the Former School in Milroy for low-income housing when feasible and discouraging displacement of residents as we redevelop. We will enhance economic competitiveness by improving the marketability of our County through blight removal and by offering industrial sites for development in

prime locations, such as the Former Kerr McGee in Rushville and the Former Smurfit Stone in Carthage. We will **support existing communities** by removing sources of blight and contamination to improve public health and welfare, such as the Triangle Former Gas Station Property and the Grain Elevator, which are both potential contaminant sources. We will **coordinate and leverage Federal investments** by seeking out grants for cleanup and redevelopment through the Indiana Brownfields Program, the Indiana Office of Community and Rural Affairs, and the US Department of Agriculture. We will also continue our relationship with local job training resources like Manufacturing Matters and Work-Ready Communities. Finally, we will **value communities and neighborhoods** as we incorporate public input into our plans through our print and social media campaigns, and work with local organizations like the Milroy Economic Development Group, Rush County Chamber of Commerce, the Rotary Club of Rush County, Rush County Historical Society, The Rushville Optimist Club, and the Rushville Rotary Club.

V.B.4.c. Economic Benefits

i. Economic Benefits: Assessing local brownfield sites will be essential to the economic growth of our communities. Accurate and current assessments will increase the marketability of our vacant properties. As they become re-inhabited and are back on the tax rolls, our tax base will expand and create revenue for the County. As mentioned above, job creation is another priority, and we will move forward on that objective through the brownfields program. As industrial sites in the County are revitalized, large-scale industry will have a reason to return to the area. This may not happen overnight, but this Coalition is committed to a long-term strategy of growth.

Brownfields identified in our targeted communities have significant economic redevelopment opportunities because of their potential to create jobs. While primary job creation will occur as these properties are redeveloped and put back into use, we

Site	Industry	Jobs	Sales	Indirect
		ľ	Impact	Business Taxes
Main St. Rushville	Retail	20	\$950,515	\$134,070
Smurfit Stone	Manufacturing	1,800	\$416 million	\$1.6 million
Former School	Housing	5	\$363,972	\$16,966
Former Kerr McGee	Manufacturing	12	\$2.8 million	\$41,731
Vacant Lot	Retail	4	\$190,103	\$26,814
Former Grain Elevator	Manufacturing	20	\$4.6 million	\$69,552
Triangle Property	Retail	5	\$255,988	\$28,033
Source: Ball State Universit	y's Economic Impa	act Calcul	ator, profiles che	rdata.org/calculator

also hope to see secondary job creation blossom as more employers are brought to the area after removal or rehabilitation of blighted buildings and properties. Given the poverty rate and high unemployment rates, creating local jobs is a necessity. Beyond the positive impact that adequate employment will have on our residents' quality of life, creating new jobs will greatly benefit the County through sales and taxes, as demonstrated in the table above.

ii. Efforts to Promote Local Hiring/Job Training: While we do not have any specific environmental job training programs, our local WorkOne center provides job placement services for our region, and offers career training and educational opportunities. They will facilitate our region's training needs for local jobs that may be affiliated with brownfields assessment, cleanup, and redevelopment. As well as on-site resume building and job search services, they offer online training courses that include environmental safety. Please see Attachment D for their letter of commitment. We are also participating in Work Ready Communities and Manufacturing Matters, two regional efforts that help shrink the gap between education, the workforce, and available jobs. Work Ready Communities assesses the skills and potential of participating communities' workforce and guides them into improving on their weaknesses and capitalizing on their strengths. Manufacturing Matters offers scholarships for training programs that prepare individuals for high-quality jobs in advanced manufacturing and related technologies.

V.B.5.a. Programmatic Capability: The Coalition currently has a brownfields team in place that is actively seeking viable options for creating opportunities for redevelopment within the City. Mayor Mike Pavey, Mayor of Rushville, will be the project lead, providing guidance and insight, and working with property owners throughout the City and County to gain site access. He has been an integral part of Rushville for two decades, serving in various roles within the City since 1994. Mr. John McCane will provide direction and assistance as the project manager for the proposed EPA Assessment project. He will manage the day-to-day activities associated with the grant, including communication with the EPA and Indiana Department of Environmental Management. Mr. McCane is the Executive Director for the Rush County Economic and Community Development Corporation (ECDC) and the former Mayor of Rushville. The financial officer for the project will be Clerk-Treasurer Ann Copley, who has served the City as Clerk-Treasurer since 1998, assuring the City's competitiveness in applying for grants, managing and investing the City's funds, and providing annual financial reports to the Indiana State Board of Accounts.

The City will hire an experienced, qualified consultant to manage the technical portions of the project and will follow Federal procurement guidelines to procure those services. The City has already begun the selection process to ensure that the Mayor will have both his City staff as well as a qualified consultant in place prior to the grant award announcements, which enables the project team to begin activities immediately upon grant award. In the event of employee turnover, the project team will find and train a replacement with previous experience in redevelopment and city visioning to ensure successful continuity. The team will be in constant communication with one another, so if one member of the team can no longer participate, another will be able to handle his or her duties until a replacement is trained.

V.B.5.b. Audit Findings: The City of Rushville has received no adverse audit findings.

V.B.5.c. Past Performance and Accomplishments: This Coalition has not received an EPA Brownfield Grant in the past but is confident in our past grant management experience. Please see the table below for examples of successful recent grant management. Grant projects include economic development, downtown revitalization, community planning, and road improvements.

development, downe			Program	Output
Funding Agency	Project	Grant \$	Compliance	Outcome
Office of Community and	Planning Grant,	\$38,800	In compliance with reporting	Create a Comprehensive Plan for the City of Rushville
Rural Affairs	2013	,	requirements	Downtown revitalization, job creation, and economic development
Economic Development Administration	North Rushville Industrial Park,	\$1.66 million	Planning/reporting in compliance with	Create an 80-acre industrial park in an area with existing infrastructure Create jobs, enhance economic competitiveness
	2012		EDA standards	of Rushville
Office of Community and	Façade		All reporting	Improve facades of 12 local businesses
Rural Affairs	improvements, 2009	\$500,000	requirements in compliance	Downtown revitalization, business attraction
Office of Community and Rural Affairs, Community	Planning grant,	\$50,000	Met reporting and	Create schematic design strategies to accomplish restoration of downtown facades
Development Block Grant (CDBG) program	2009	φ30,000	compliance standards	Downtown revitalization, business attraction
US Department of	Rushville 16th	\$ 1.9	Meet DOT reporting	Extend 16th Street in the City of Rushville
Transportation	Street Extension, 2013	million	and compliance standards	Improve traffic flow at a gateway to the City

Attachment A Threshold Documentation

SECTION III - APPLICANT AND SITE ELIGIBILITY INFORMATION III.A. Threshold Criteria for Assessment Grants

- 1. <u>Applicant Eligibility:</u> The City of Rushville is applying as lead applicant for the Coalition of Rushville, the Town of Carthage, and Rush County, all of which are general purpose units of local government as defined under 40 CFR Part 31. The letters in Attachment C from the Town of Carthage and Rush County show their agreement to be part of our coalition and represent their respective Counties.
- 2. <u>Letter from the State or Tribal Environmental Authority</u>: The Letter from the Indiana Department of Environmental Management is included in Attachment B.
- 3. Community Involvement (further information in section V.B.3. of narrative proposal, p. 10-12) We have had success with community engagement in the past, such as in the July 2013 Downtown Rushville Dream Walk, where over 50 Rushville residents aged 11 through 84 joined together July 15 to help create a new vision for what Downtown Rushville could become. The effort was put together through the Chamber of Commerce and Partners for Progress. Residents walked the downtown district, stopping at addresses from a list of properties that are vacant or under-utilized in the community and provide ideas of what a property could become and what was needed for a better future in Rushville.

Upon award announcement, we will issue a press release and distribute fliers discussing the project and providing progress reports to our supporting partner groups (letters in Attachment D) so they can invite their members and the population they serve to our public meetings. It is vital that our citizens provide input on site selection/prioritization for assessment, cleanup, and reuse planning. Each organization can reach out to their targeted community by handing out fliers at meetings, email or social media blasts to their members, or displaying information on their public bulletin board.

The City will also conduct a concerted outreach program using both print and social media to request involvement in the brownfields initiative and report progress. The newspaper is still the most widely-consumed news source in the Region, but we recognize that digital media is the way of the future. We will establish a Facebook and Twitter account for the Brownfields Coalition, targeting residents of Rush County and stakeholders in our area as followers of our social media campaign. We will request resident input and post updates on sites as they are assessed, when appropriate, and will also post facts about environmental health and community development news. To kick off our print media campaign, we issued a press release to The Rushville Republican. They ran an article regarding the purpose of this application and requesting community input for site inventory about on January 17, 2014. As clean-up and/or redevelopment planning is initiated for a site, more intensive involvement activities will be implemented, such as public meetings in the neighborhoods of targeted sites to discuss plans and request feedback. At the close of the Project, the City will hold a final public meeting to notify the community of the successes and challenges faced during the Project and request comments regarding the interest in pursuing additional grants. English is our primary language, but translators, sign language interpreters, and translated documents will be made available upon request to assist any non-English speaking or hearing-impaired residents.

4. <u>Site Eligibility and Property Ownership Eligibility (Site-Specific Proposals Only)</u>: As this is a Community-wide Assessment Grant Proposal, this criterion is not applicable.

Attachment B Letter from the State



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence

Thomas W. Easterly

January 22, 2014

The Honorable Mike Pavey, Mayor City of Rushville 133 West 1st Street Rushville, Indiana 46173-1901

> Re: U.S. EPA Brownfields Grant Proposal Acknowledgement Letter Coalition Assessment Hazardous Substances and Petroleum Rushville-Rush County-Carthage Coalition Rush County, Indiana

Dear Mayor Pavey:

This letter is provided in support of the City of Rushville Coalition consisting of the City of Rushville, Rush County, and the Town of Carthage (Coalition) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Assessment Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that the City of Rushville, as the lead applicant, is requesting \$460,000 (\$312,410 for hazardous substances and \$147,590 for petroleum). IDEM understands that this funding will be utilized to conduct community outreach, cleanup planning, Phase I and Phase II Environmental Site Assessments (ESAs) on the highest priority brownfield sites, and continued inventory and prioritization of sites.

IDEM believes that the Coalition has demonstrated its commitment to redeveloping brownfields by its members taking advantage of financial and technical assistance offered by the Indiana Brownfields Program in the past. This Assessment grant funding will help the Coalition continue its efforts to address brownfields within the Coalition member communities. Should an opportunity arise for the Coalition to need/purse liability clarification or cleanup/closure at any of the sites investigated with this grant funding, IDEM realizes that the Coalition is committed to working with the Indiana Brownfields Program and/or the IDEM Voluntary Remediation Program.

Based on the information submitted, IDEM considers the Coalition a good candidate to receive U.S. EPA grant funding to continue its brownfield redevelopment efforts, which support Indiana's brownfield initiative. IDEM looks forward to continuing its partnership with the



U.S. EPA Brownfields Grant Proposal 2014 Acknowledgment Letter Page 2

Coalition members. For further assistance, please contact Michele Oertel of the Indiana Brownfields Program toll free at (800) 451-6027, ext. 4-0235, or directly at (317) 234-0235 or at moertel@ifa.in.gov.

Sincerely,

Bruce A. Oertel, Chief Remediation Services Branch Office of Land Quality

BAO/mmo

cc: (via electronic transmission)

Linda Mangrum, U.S. EPA Region 5 Kelley Moore, U.S. EPA Region 5

John McCane, Rush County Economic and Community Development Corporation

Attachment C Letters of Commitment from Coalition Members

Mayor Michael C. Pavey City of Rushville, Indiana 133 W. First Street Rushville, IN 46173

Dear Mayor Pavey,

The Town of Carthage is an integral member of the Rushville Brownfields Coalition applying for the EPA Brownfield Assessment Grant.

Because Carthage is such a small community, we have a unique opportunity to reach residents through local media, public meetings and "word of mouth". Members of our Town Council have an in-depth knowledge of the area, past industries and possible sites to be assessed; they will provide input and participate in the decision-making process. The large Carthage Community Center can be used for various meetings and as an outreach center for grant activities. Our Clerk Treasurer, Linda McMahan, will be able to provide information and assistance needed on a daily basis.

The Town of Carthage is a Board Member of the Rush County Economic & Community Development Corporation and will continue to work closely with that staff as they coordinate efforts for this application. We need help to improve the health and safety of our community as we envision redevelopment of the unoccupied old Smurfit Stone Company building. This is just one of the sites we have preliminarily identified that could benefit from an environmental assessment. Members of the council are willing to donate our time as an in-kind service to move this project forward.

Marsha Dyer

Carthage Town Council President

Marsha Dysz



Rush County Board of Commissioners

Room 212 101 East Second Street Rushville, Indiana 46173

January 13, 2014

Mr. Don West Environmental Management Support, Inc. 8601 Georgia Avenue, Suite 500 Silver Springs, MD 20910

Dear Mr. West,

As a member of the Rushville Brownfields coalition / partnership that is applying for the EPA Brownfield Assessment Grant, we would like to describe our involvement and reiterate our support. As coalition members, we pledged to bring our individual resources to this project. Those resources include such things as attending all organizational and administrative meetings, providing input and decision making. We can provide meeting space and participate in outreach efforts to the community. More specifically, we can provide the services of the Rush County Assessor, Auditor, Emergency Management Director and GIS Technician. Those offices could provide information relevant to their respective duties - the Assessor's office could monitor property values of brownfield sites and around brownfield sites; GIS could be used to create a map of the brownfields inventory; the Auditor could provide chain of title information for eligibility purposes; Emergency Management could give information about the hazards of abandoned/vacant sites.

Our continued financial support of the Rush County Economic & Community Development Corporation through EDIT funds speaks of our commitment to this and other projects for the betterment of Rush County.

Thank you in advance for your careful consideration of this application.

Bruce Levi

President Rush County Commissioners

Mike Pavey, Mayor 765-932-3735 Ann Copley, Clerk-Treasurer 765-932-2672



December 17, 2013

Mr. Don West Environmental Management Support, Inc. 8601 Georgia Avenue, Suite 500 Silver Springs, MD 20910

Dear Mr. West,

The City of Rushville urges the EPA to approve the Rushville Brownfields Coalition's application for an EPA Brownfields Assessment Coalition Grant. While this coalition is led by the City of Rushville, our partners at Rush County and Town of Carthage are equally engaged and working closely with the Rush County Economic & Community Development Corporation (ECDC) to complete the application and move this process forward. The opportunity to partner with these entities strengthens our ability to protect and redevelop properties not only in the City, but also throughout the county. We know there are contaminated sites where assessment is needed; this assessment would help us plan for remediation and redevelopment.

The City is committed to assist in this effort and help monitor the project. We will continue to support ECDC financially through the City's EDIT allocation and can also enlist the resources of the Rush County Chamber of Commerce. Providing meeting space, helping with research of properties, marketing the project and planning for redevelopment are just a few of the other commitments the City will make. Other City departments that will be utilized are the Rushville Police, Fire and Street Departments. The City Clerk-Treasurer will also be involved.

This grant is important to us as it will lead to more growth and economic development in our rural area. It will allow us to pursue a program that will lead to clean sites and improve the environment. Once again, we ask that you award this grant to the Rushville Brownfields Coalition and help us move polluted properties one step closer to redevelopment.

Thank you!

Sincerely,

Michael P. Pavey, Mayor

City of Rushville

MPP/cs

Attachment D

Letters of Support from Community Organizations. WorkOne, and County Health Department

Partners For Progress Rushville, IN

Date: January 9, 2014

Mayor Michael C. Pavey City of Rushville, Indiana 133 W. First Street Rushville, IN 46173

Dear Mayor Pavey,

Partners for Progress is a partnership that was formed so the residents of Rush County and Rushville, IN, could work together to address the areas of concern in our communities. We want to be part of the City of Rushville, the Town of Carthage, and Rush County's efforts to assess brownfields throughout the County.

We commit to working together with the brownfield team for the purpose of identifying the needs of our neighborhoods. We will also work with residents to envision what can be done with the brownfields and pass their input on to the brownfields team. We will assist in communicating the project benefits to residents and property owners in the area and strive to encourage developers to locate on these brownfield sites.

We want our residents to be proud of their community and make positive changes in it. Partners for Progress wholly supports the City of Rushville, the Town of Carthage, and Rush County's application for funding from the US EPA for a Brownfields Assessment Grant.

Sincerely,

Jason Clemmons

Partners for Progress



www.milroyin.org

Milroy Economic Development Group

Milroy, IN 46156

Mayor Michael C. Pavey City of Rushville, Indiana 133 W. First Street Rushville, IN 46173

December 17, 2013

Dear Mayor Pavey,

The Milroy Economic Development Group (Milroy EDG) is pleased to partner with the City of Rushville, the Town of Carthage, and Rush County in their request to the U.S. Environmental Protection Agency for a Brownfields Assessment Grant. The Milroy Economic Development Grant is committed to assisting with the identification of sites where environmental assessments may be needed.

As the initial contact for businesses looking to expand into or relocate to Milroy and Rush County, we are in a position to assist Rush County in identifying and prioritizing brownfield sites that offer the strongest potential for private investment. The Milroy EDG works to give consultants and business leaders the necessary information to succeeding when expanding or relocating to Rush County.

We look forward to working to complete the community-wide assessment of brownfield sites.

Sincerel

Robert N. Jackman, D.V.M.

President MEDC

MEDC Officers

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December 17th, 2013

Mayor Michael C. Pavey City of Rushville, Indiana 133 W. First Street Rushville, IN 46173

Dear Mayor Pavey,

The Rush County Chamber of Commerce of Rush County, Indiana, has already been involved in visioning activities that support the City of Rushville, Rush County and Town of Carthage's application for a U.S. Environmental Protection Agency (EPA) Brownfield Assessment Coalition Grant. We wish to continue that support throughout the terms of the grant.

Our recent visioning activity was called the "Dream Walk." During it, local residents assessed the needs of the downtown district of Rushville, particularly those empty buildings that are quickly becoming eyesores. Participants were asked that they dream of how these spaces could be used by placing a post-it note with their idea on the storefront. I'm sure we could bring some of these ideas to fruition when we have better information about any possible pollution or contamination.

Rush County Chamber will further support this effort by educating our membership and posting information on our website and social media link. The Rush County Chamber recognizes the importance of assessing areas in Rush County that are vacant or abandoned and planning for their clean up, reuse or redevelopment. This grant will provide much needed funds and the impetus to bring us closer to our goal of mitigating environmental issues.

Sincerely,

Sandy Fussner, Executive Director

Landytusson

Rush County Chamber of Commerce

Rush County Historical Society 619 N. Perkins St. P.O. Box 302 Rushville, IN 46173

January 9, 2014

Mayor Michael C. Pavey City of Rushville, Indiana 133 W. First Street Rushville, IN 46173

Dear Mayor Pavey.

The Rush County Historical Society is a non-profit entity in the City of Rushville that wholeheartedly believes in City of Rushville, the Town of Carthage, and Rush County's application for an EPA Coalition Brownfields Assessment Grant. We maintain the county's historical integrity during new development, as well as preserving our older development, and we commit to aiding in the brownfields initiative.

We will work with our communities to develop a list of historical buildings that can be revitalized and taken from brownfield status to being an integral part of the community. We will also be available to offer our expertise on historic issues that arise with the sites and we will provide a platform for discussing brownfield properties at our regularly-scheduled meetings.

The Rush County Historical Society was organized in 1922 and we took on the task of collecting, researching, preserving, and interpreting historical information and artifacts of Rush County, Indiana. We want to promote historic preservation and foster the revitalization of Rush County's historic neighborhoods, including the lovely downtowns in our communities. We want to see the abandoned historic buildings in our cities revitalized, instead of tearing them down or leaving them vacant. Our interest lies in putting these buildings to their best use.

We look forward to working with the brownfields team on this initiative.

Sincerely,

John O. Milson

President

1/14/14

Mayor Michael C. Pavey City of Rushville, Indiana 133 W. First Street Rushville, IN 46173

Dear Mayor Pavey,

The Rushville Optimist Club is here to help the City of Rushville, the Town of Carthage, and Rush County in their quest to clean up "problem properties" through a Brownfields Assessment Grant from the US Environmental Protection Agency.

Our mission statement says it all: "By providing hope and positive vision, Optimists bring out the best in kids." From the very beginning, the Club's main focus was toward youth service and that youth is still our focus today. Today's youth have definite opinions on a wide variety of subjects and want to be heard. We commit to educating them about brownfields and getting them involved in the brownfields process. We will get their input and provide that information to the community and brownfields team.

We have adult volunteers that work in their communities providing a helping hand to its youth, all the while conducting positive service. Our volunteers help to empower young people to be the very best they can be.

We look forward to seeing the redevelopment of the brownfields that the City of Rushville, the Town of Carthage, and Rush County has planned and fully support all of their efforts.

Sincerely,

John Wall president Rushville Breakfast Club Optimists

FRIEND OF YOUTH

BREAKFAST OPTIMIST CLUB P.O.BOX 311 RUSHVILLE INDIANA 46173

> Rush Co ECDC River Point office Suiter 210 E US 52

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Rushville Rotary Club Rushville, IN

December 17, 2013

Mayor Michael C. Pavey City of Rushville, Indiana 133 W. First Street Rushville, IN 46173

Dear Mayor Pavey,

The Rushville Rotary Club wants to offer its problem-solving and visioning services to the City of Rushville, the Town of Carthage, and Rush County in their plans to conduct assessments and redevelopment associated with brownfields located in our communities.

Our members meet to discuss Rush County and its communities' needs and come up with creative ways to meet those needs. We commit to working with the Brownfield team identify brownfields in our communities and assist with ideas on redevelopment and creating business plans for those brownfields utilizing the business knowledge of our local members.

Paul P. Harris had a vision and in 1905, the Rotary Club of Chicago was formed. This Club was a place where professionals of all backgrounds could meet, exchange ideas, and form lifelong friendships. Our Club members have a wealth of experience and can bring many ideas to the table to help solve local problems.

As members of the Rushville Rotary Club, we support the City of Rushville, the Town of Carthage, and Rush County in their application for an EPA Community-wide Assessment Grant

Sincerely.



January 17, 2014

Mayor Michael P. Pavey City of Rushville 133 W. 1st Street Rushville, IN 46173

Dear Mayor Pavey,

Girl Scouts of Central Indiana 2611 Waterfront Pl wy E Dr Sce 100 Indianaposis, IN 46214 317 924 6800/577,474,2248 g riscouts/siciana org

Girl Scouts of Central Indiana and Crossroads of America Council, Boy Scouts of America are pleased to partner with Brownfield Coalition of the City of Rushville, Rush County and the town of Carthage. Girl Scouts and Boy Scouts provide experiences that will help our youth gain life-long skills and prepare them to be leaders in our communities. Environmental stewardship is an important part of what we want central Indiana youth to learn, and the Brownfield initiative is an excellent way for them to get involved in a project that is good for the environment and for Rush County communities. The service project we have outlined will include the following and will allow participants to earn badges and/or awards for their efforts.

- 1. Develop an inventory of Brownfield's in Rushville, as well as other Rush County communities.
- 2. Identify Brownfield sites on a map to create a "Brownfield's Map" of Rush County.
- 3. Present the inventory and map to the mayor of Rushville.

The Brownfield Coalition will be able to use the inventory and map we create to identify and prioritize sites for assessment and redevelopment. We hope to continue to do more service projects in the future, such as entering site data into the Technical Assistance to Brownfields Inventory Tool database to further our assistance with the coalition.

Girl Scout Law includes a pledge to use resources wisely and make the world a better place. This initiative promotes our goals and values, and we are excited to be a part of it.

Best regards,

Deborah Hearn Smith Chief Executive Officer



Landath



Proposal for EPA FY2014 Brownfields Assessment Grant

The Coalition of the City of Rushville, the Town of Carthage, and Rush County, Indiana

Appendix 3 Other Factors Checklist

Name of Applicant: Coalition: City of Rushville, Town of Carthage, and Rush County

Please identify (with an X) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
x	Community population is 10,000 or less	1
	Federally recognized Indian tribe	
	United States territory	
	Applicant will assist a Tribe or territory	
	Targeted brownfield sites are impacted by mine-scarred land	
	Targeted brownfield sites are contaminated with controlled substances	
	Recent natural disaster(s) (2006 or later) occurred within community, causing	
	significant community economic and environmental distress	
	Project is primarily focusing on Phase II assessments.	
	Applicant demonstrates firm leveraging commitments for facilitating brownfield	
	project completion by identifying amounts and contributors of funding in the	
	proposal and have included documentation	
x	Community experienced manufacturing plant closure(s) (2008 or later) tied to the	1 & 4
	targeted brownfield sites or project area, including communities experiencing	
Ш	auto plant closures due to bankruptcy or economic disruptions.	
	Recent (2008 or later) significant economic disruption (unrelated to a natural	
	disaster or manufacturing/auto plant closure) has occurred within community,	
	resulting in a significant percentage loss of community jobs and tax base.	
	Applicant is a recipient or a core partner of a HUD-DOT-EPA Partnership for	
	Sustainable Communities (PSC) grant that is directly tied to the project area, and	
	can demonstrate that funding from a PSC grant has or will benefit the project	
	area. To be considered, applicant must attach documentation which	
	demonstrates this connection to a HUD-DOT-EPA PSC grant.	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant	
	Community is implementing green remediation plans.	
	Climate Change (also add to "V.D Other Factors")	